

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of all others  
similarly situated,

Plaintiffs,

v.

REGISTER.COM, INC,

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

**DEFENDANT’S PRELIMINARY WITNESS AND EXHIBIT LIST**

Defendant Register.com, Inc. (“Defendant”), by counsel, pursuant to the Scheduling Order entered by the Court on June 10, 2025, hereby submits its Preliminary Witness and Exhibit Lists. Discovery is currently ongoing and will likely reveal additional witnesses and exhibits, which will be necessary for trial, or will reveal that the witnesses and exhibits identified below will not be used at trial. As such, Defendant respectfully reserves its right to supplement and/or revise the witness and exhibit list until the deadline set forth in the Court’s Case Management Plan for final witness and exhibit lists. Additionally, Defendant’s submission of this list pursuant to the Court’s Order in no way constitutes a waiver of its right to object to the Court’s exercise of personal jurisdiction. Accordingly, Defendant respectfully submits the following.

**PRELIMINARY WITNESS LIST**

1. Tiffany Lewis (“Plaintiff”).
2. Register.com, Inc. (“Defendant”).
3. Raymond Michael Godfrey.

4. Frank Soto.
5. Employees of Defendant familiar with the Defendant's customer calling practices.
6. Employees of Defendant familiar with Defendant's collections practices.
7. Employees of Defendant familiar with Defendant's sales practices.
8. Employees of Defendant familiar with Defendant's employee training practices.
9. Any individual who may serve as the custodian of records from Plaintiff's phone carrier.
10. Any individual who is familiar with the circumstances under which the phone number XXX-XXX-9800 was assigned to Plaintiff.
11. Any individual who purports to be similarly situated to Plaintiff and/or part of the proposed class.
12. Any individual identified or disclosed through the discovery process.
13. Any individual necessary for purposes of the authentication of documents.

**PRELIMINARY EXHIBIT LIST**

1. Records reflecting the account information of Defendant's customers, including the phone number associated with each customer account and records including customer consent to be contacted by Defendant.
2. Records reflecting procedures and circumstances under which Defendant contacts its customers via telephone concerning customer accounts.
3. Records of relevant contacts made with customers via telephone pursuant to Defendant's internal procedures.
4. Records reflecting Defendant's internal employee onboarding and training practices concerning customer service, customer calls, sales, and collections.

5. Records reflecting Defendant's customer telephone number database relating to customer accounts.
6. Records reflecting terms and conditions, authorization, and/or any other agreement that customers of Register.com are required to review and assent to in order to procure Defendant's services.
7. Documents related to Plaintiff's subscribership or assignment of the phone number, XXX-XXX-9800.
8. Documents related to Plaintiff's phone carrier and phone plan for the phone number, XXX-XXX-9800.
9. Documents related to any physical, mental, or emotional damages claimed by Plaintiff and/or other members of the proposed class.
10. Plaintiff's responses to Defendant's discovery requests.
11. Any documents produced by Plaintiff in response to Defendant's discovery requests.
12. Any documents produced or identified by Plaintiff through her Initial Disclosures.
13. Any exhibit listed by Plaintiff.

Dated: July 17, 2025

Respectfully submitted,

/s/ A. Jeff Ifrah

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of July 2025, I electronically filed a copy of the foregoing with the Clerk of Court via CM/ECF which will notify all counsel of record.

/s/ A. Jeff Ifrah  
A. Jeff Ifrah